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**CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL C. KEO, an individual

Plaintiff,

vs.

GOLDWYN ENTERPRISES, INC., a  
California corporation;

Defendants.

Case No.: 8:22-cv-02266-DOC-ADS

**PLAINTIFF'S NOTICE OF  
VOLUNTARY DISMISSAL OF  
ENTIRE ACTION WITH  
PREJUDICE PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)**

1 **PLEASE TAKE NOTICE** that Plaintiff Michael C. Keo (“Plaintiff”) pursuant to  
2 Federal Rule of Civil Procedure Rule 41(a)(1), hereby voluntarily dismisses the entire  
3 action *with prejudice* pursuant to Federal Rule of Civil Procedure Rule 41(a)(1)  
4 which provides in relevant part:

5 **(a) Voluntary Dismissal.**

6 (1) By the Plaintiff.

7 (A) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and  
8 66 and any applicable federal statute, the plaintiff may dismiss an  
9 action without a court order by filing:

10 (i) A notice of dismissal before the opposing party serves either  
11 an answer or a motion for summary judgment.  
12

13 Defendant GOLDWYN ENTERPRISES, INC. a California corporation has neither  
14 answered Plaintiff’s Complaint, nor filed a motion for summary judgment.  
15 Accordingly, Defendant may be dismissed with prejudice and without an Order of  
16 the Court.

17  
18 ASCENSION LAW GROUP, PC

19 DATE: March 6, 2023

20 /s/ Pamela Tsao

21 Pamela Tsao, attorney for Plaintiff

22 Michael C. Keo  
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